



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**MAY 02 2014**

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED 7009 1680 0000 7677 7629**

Ms. Colleen Klaiber  
EHS Manager for Product Development and Global Technology  
Caterpillar, Inc.  
909 Cedar Hills Drive  
Mossville, Illinois 61552

Re: Notice of Violation  
Caterpillar Inc., Technical Center  
EPA ID No.: ILD067407627

Dear Ms. Klaiber:

On February 11, 2014, a representative of the U.S. Environmental Protection Agency inspected the Caterpillar Inc., Technical Center (Caterpillar) located in Mossville, Illinois. The purpose of the inspection was to evaluate Caterpillar's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on information provided by Caterpillar personnel, review of records, and physical observations made by the inspector at the time of the investigation, EPA has determined that Caterpillar is engaged in the storage of hazardous waste without a permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage permit, Caterpillar must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 CFR §§ 262.34(a) and (c)]. We find that Caterpillar was not in compliance with one of the conditions for a hazardous waste storage permit exemption, and in violation of the following requirement:

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan which includes, among other things, a description of the arrangements agreed to by local police department, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 35 IAC § 725.137 (40 C.F.R. § 265.37). See, 35 IAC §§ 722.134(a)(4) and 725.152(c) [40

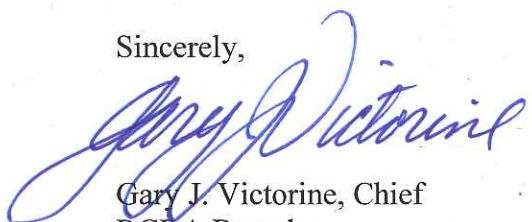
C.F.R. §§ 262.34(a)(4) and 265.52(c)]. This is also a requirement for owners and operators of hazardous waste storage facilities at 35 IAC § 724.152(c) [40 C.F.R. § 264.52(c)]. At the time of the inspection, Caterpillar's contingency plan did not describe the above-mentioned arrangements, with the exception of those made with a private contractor. Therefore, Caterpillar failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the storage facility contingency planning requirement.

2. A large quantity generator who accumulates hazardous waste on-site and who does not meet the conditions for a permit exemption of 35 IAC § 722.134(a) [40 C.F.R. § 262.34(a)] is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC § 703.121(a) [40 CFR § 270.1(c)]. Upon failing to comply with the permit exemption condition described in item 1, above, Caterpillar's failure to apply for and obtain a hazardous waste storage permit violated the requirements of 35 IAC § 703.121(a) [40 CFR § 270.1(c)].

At this time, EPA is not requiring Caterpillar to apply for a hazardous waste storage permit, so long as it immediately establishes compliance with the condition for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above condition and requirement.

You should submit your response to Todd Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Caterpillar Inc. Technical Center

U.S. EPA ID No.: ILD067407627

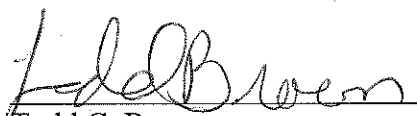
LOCATION ADDRESS: 909 Cedar Hills Drive  
Mossville, Illinois

NAICS CODE: 333120 – Construction Machinery Manufacturing

DATE OF INSPECTION: February 11, 2014

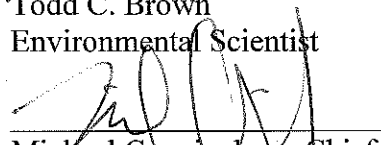
U.S. EPA INSPECTOR: Todd C. Brown

PREPARED BY:

  
Todd C. Brown  
Environmental Scientist

3/18/14  
Date

REVIEWED BY:

  
Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch

3/18/14  
Date



## I. Purpose of Inspection

The purpose of this unannounced compliance evaluation inspection (CEI) was to evaluate the compliance of Caterpillar Technical Center, with the Resource Conservation and Recovery Act, with respect to its management of hazardous waste, universal waste and used oil.

## II. Site Description

Caterpillar Technical Center (Caterpillar) is a research and development facility at which various performance aspects of Caterpillar engines are tested (e.g., emissions, drive train, vibration, strength, etc.). The installation constitutes several buildings on a roughly 200 acre campus (Figure 1). They are a large quantity generator (LQG) whose operations produce a variety of hazardous waste streams including, but not limited to: paint waste, mixed solvents, discarded chemicals, and compressed gas. Universal waste batteries and used oil are also generated. Containers of hazardous waste are stored in a fenced-in structure on the north side of the campus. Satellite accumulation containers for collection of paint waste and mixed solvents are located in buildings E and K, respectively.



**Figure 1:** Aerial view of the Caterpillar Inc., Technical Center campus.

## III. Opening Conference

I arrived at Caterpillar on February 11, 2014, at approximately 9:30 A.M. and conducted an opening conference with Colleen Klaiber, EHS Manager for Product Development and Global Technology; and Kristin Tanner, Hazardous Waste Coordinator. I presented Ms. Klaiber with my EPA credentials, explained the purpose of the inspection, and interviewed the Caterpillar representatives on facility operations and waste management.

One satellite accumulation container was located at a paint booth in Building K. The container was labeled and closed. One satellite accumulation container of mixed organic solvent waste was located in a metal cabinet at a laboratory in building E (Rm. 807). The container was labeled and closed.

## **V. Records Review**

I reviewed the following records: hazardous waste manifests, land disposal restriction notifications, daily inspection logs for the hazardous waste storage area, contingency plan, RCRA training documents, Annual Hazardous Waste Reports, and waste analysis records.

Manifests were on-file dating back until at least to 2009. The records indicate that shipments of hazardous waste in 2014 included, but were not limited to: mercury waste, lab packs, kerosene and aerosols. I did not observe deficiencies with any of the manifest records reviewed.

Caterpillar documents daily inspections of its hazardous waste storage area. Mr. Tom Reed appeared to perform the majority of the inspections.

The contingency plan was last updated in April 2013. Though Caterpillar maintains documentation in the form of letters indicating that it has attempted to make arrangements with the police department, fire department, and medical responders in accordance with 40 C.F.R. § 265.3, these arrangements are not described in the contingency plan. Arrangements with contractors were described in the plan. Caterpillar maintains its own nurse and paramedic staff.

Both Ms. Tanner and Klaiber maintain documentation of attendance for an off-site RCRA training course provide by Veolia. Caterpillar maintains records documenting in-house training provided by Ms. Tanner to employees: Tom Reed and Jim Guiliani. Titles and descriptions of positions involving hazardous waste management are included in the contingency plan. A power-point presentation used in the course was available for review.

Annual hazardous waste reports and records of waste determinations were on-file. I did not observe any deficiencies with these documents.

## **VI. Closing Conference**

I conducted a brief conference with Ms. Klaiber and Tanner at the conclusion of the inspection. I informed them that the contingency plan not describing arrangements made with local authorities was a potential compliance issue.

A: Inspection Photographs

B: RCRA Generator Inspection Checklist (Part 722)



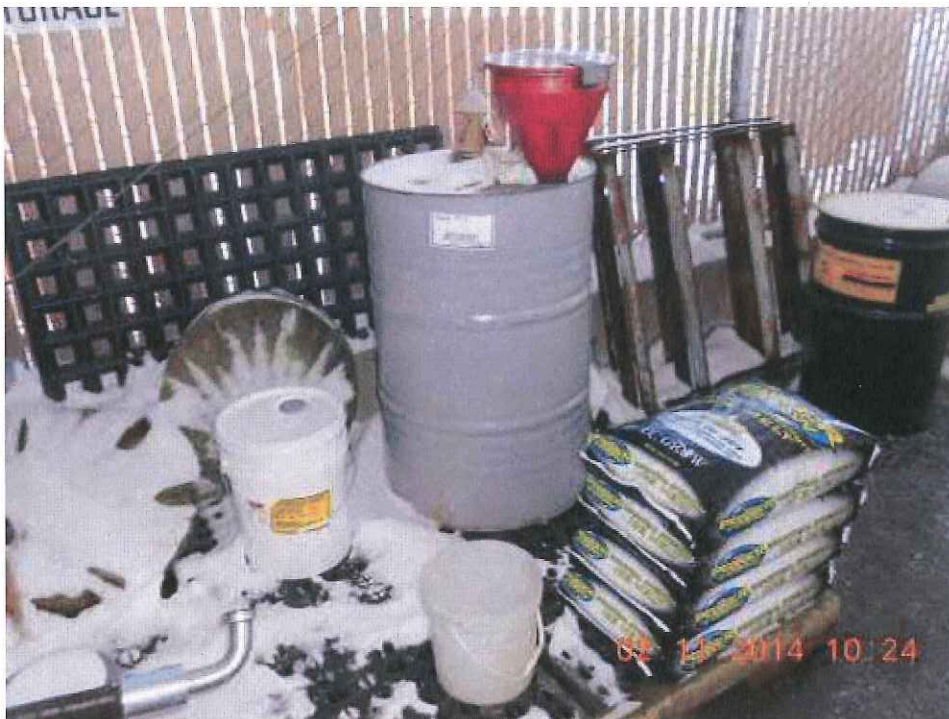
**Attachment A: Photographs for Caterpillar, Inc. Technical Center (ILD067407627)  
Mossville, IL**

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**Photo Number** 1  
**Photo Filename** DSCN0610.JPG  
**Date/Time** 2/11/2014  
10:25:00 AM  
**Photographer** Todd Brown

**Description**

55-gallon container of used oil. Location:  
Hazardous waste storage area.



**Photo Number** 2  
**Photo Filename** DSCN0611.JPG  
**Date/Time** 2/11/2014  
10:26:58 AM  
**Photographer** Todd Brown

**Description**

Containers of universal waste. Location:  
Hazardous waste storage area.



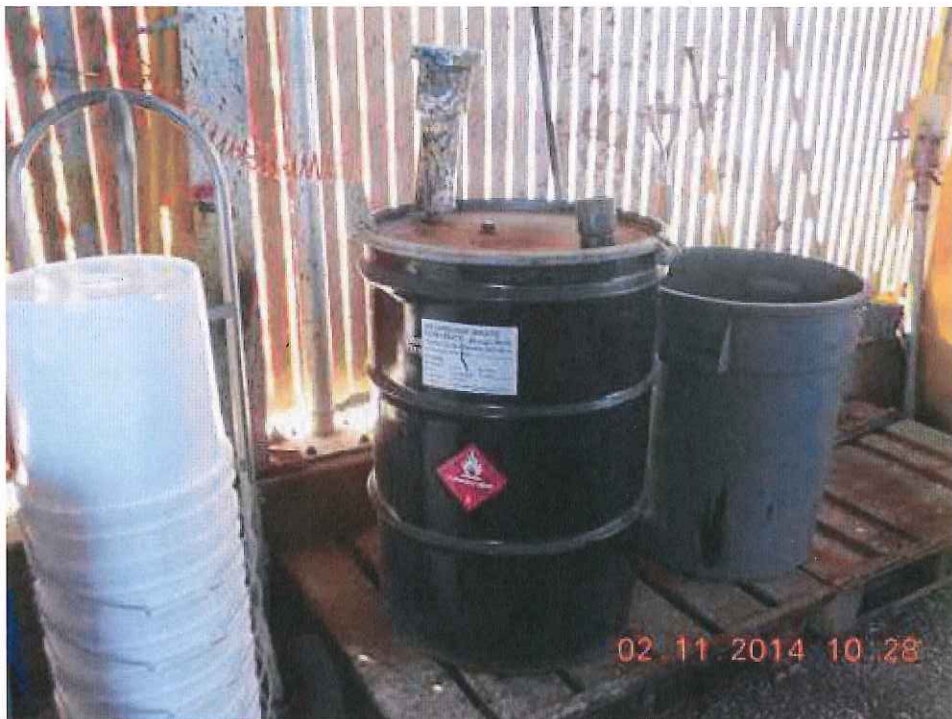


**Attachment A: Photographs for Caterpillar, Inc. Technical Center (ILD067407627)  
Mossville, IL**

**Photo Number** 3  
**Photo Filename** DSCN0612.JPG  
**Date/Time** 2/11/2014  
10:28:16 AM  
**Photographer** Todd Brown

**Description**

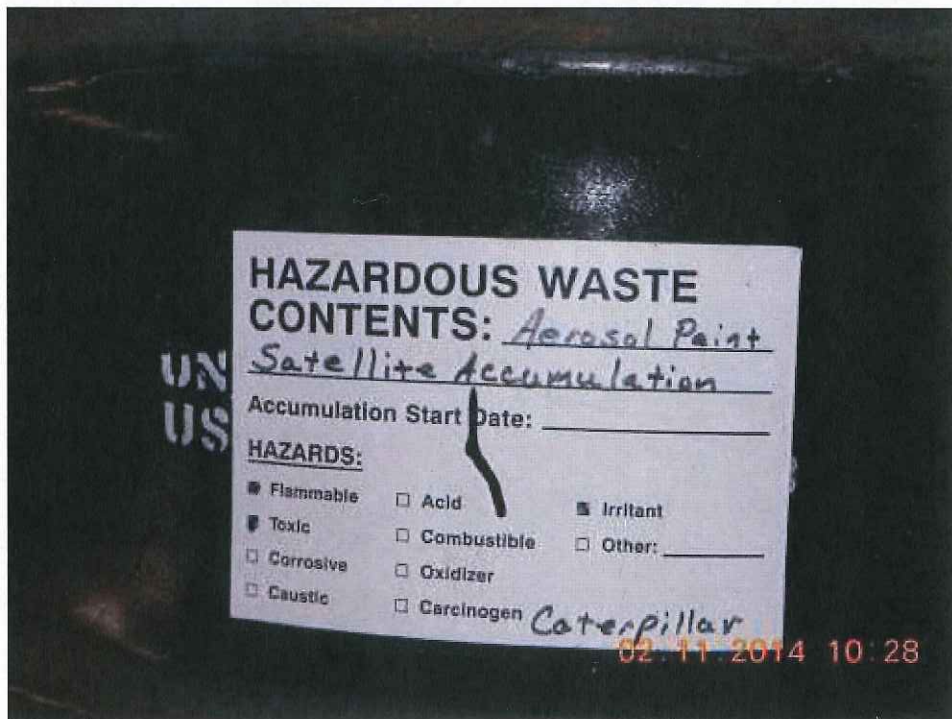
55-gallon container of aerosol paint waste.  
See photograph 4 for label. Location:  
Hazardous waste storage area.



**Photo Number** 4  
**Photo Filename** DSCN0613.JPG  
**Date/Time** 2/11/2014  
10:28:30 AM  
**Photographer** Todd Brown

**Description**

Label on container of aerosol paint waste  
featured in photograph 3. Location:  
Hazardous waste storage area.



**Attachment A: Photographs for Caterpillar, Inc. Technical Center (ILD067407627)  
Mossville, IL**

**Photo Number** 5  
**Photo Filename** DSCN0614.JPG  
**Date/Time** 2/11/2014  
10:29:00 AM  
**Photographer** Todd Brown

**Description**

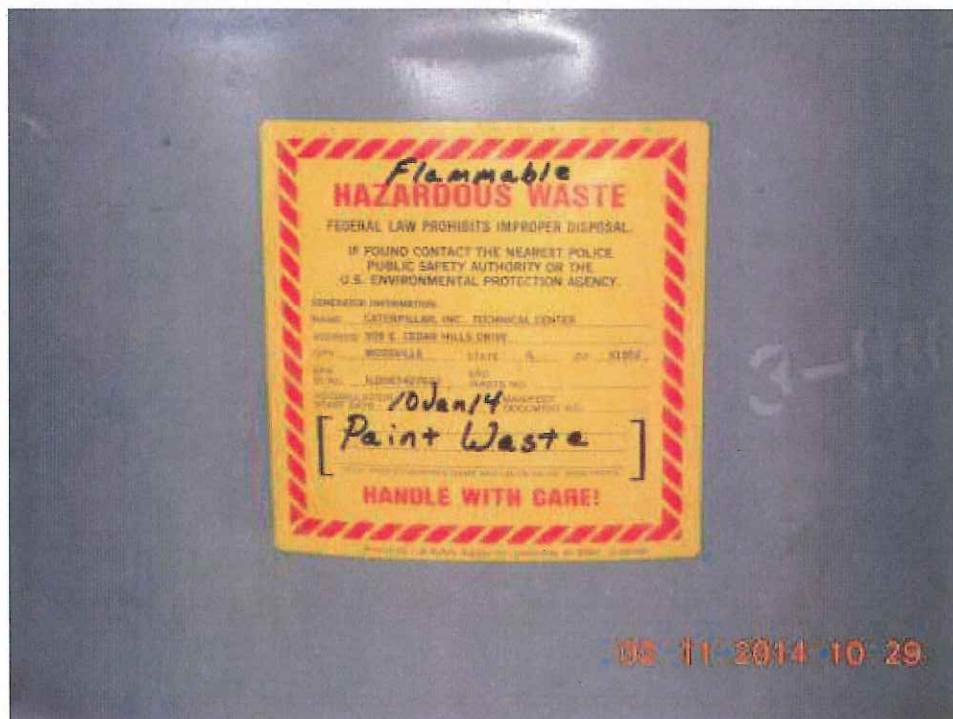
55-gallon container of paint waste. See photograph 6 for label. Location: Hazardous waste storage area.



**Photo Number** 6  
**Photo Filename** DSCN0615.JPG  
**Date/Time** 2/11/2014  
10:29:10 AM  
**Photographer** Todd Brown

**Description**

Label on container of paint waste featured in photograph 5. Location: Hazardous waste storage area.





**Attachment A: Photographs for Caterpillar, Inc. Technical Center (ILD067407627)  
Mossville, IL**

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**Photo Number** 7  
**Photo Filename** DSCN0616.JPG  
**Date/Time** 2/11/2014  
10:29:30 AM  
**Photographer** Todd Brown

**Description**

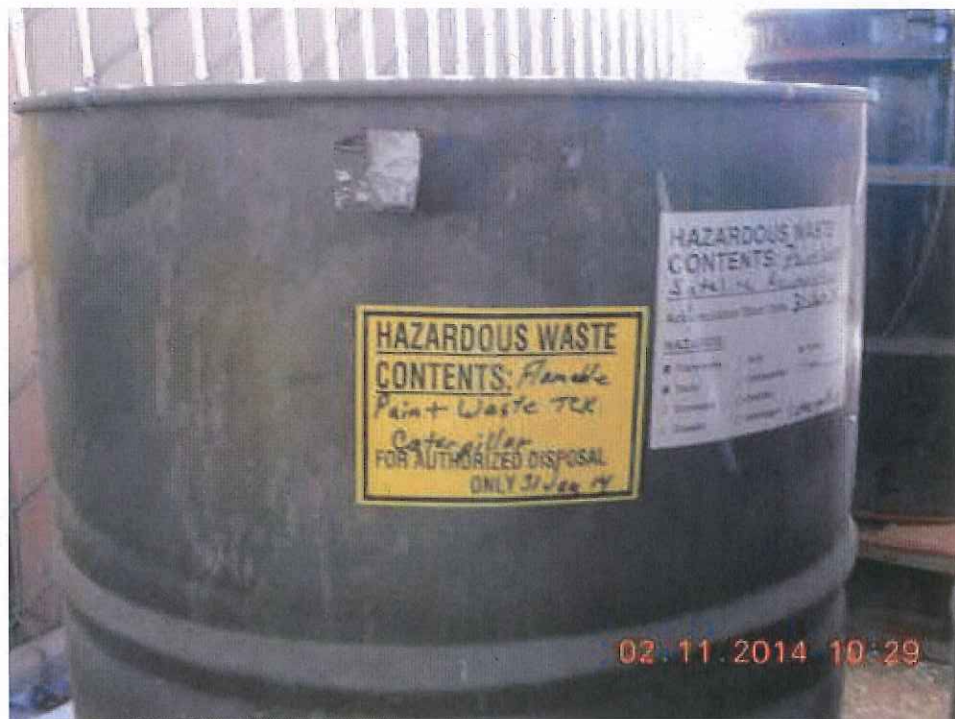
Left: 55-gallon container of paint waste.  
Right: 55-gallon container of methyl ethyl  
ketone waste. Back: 55-gallon container of  
gas cylinder waste. See photographs 8 - 10  
for labels. Location: Hazardous waste  
storage area.



**Photo Number** 8  
**Photo Filename** DSCN0617.JPG  
**Date/Time** 2/11/2014  
10:29:38 AM  
**Photographer** Todd Brown

**Description**

Label on the 55-gallon container of paint  
waste featured in photograph 7. Location:  
Hazardous waste storage area.

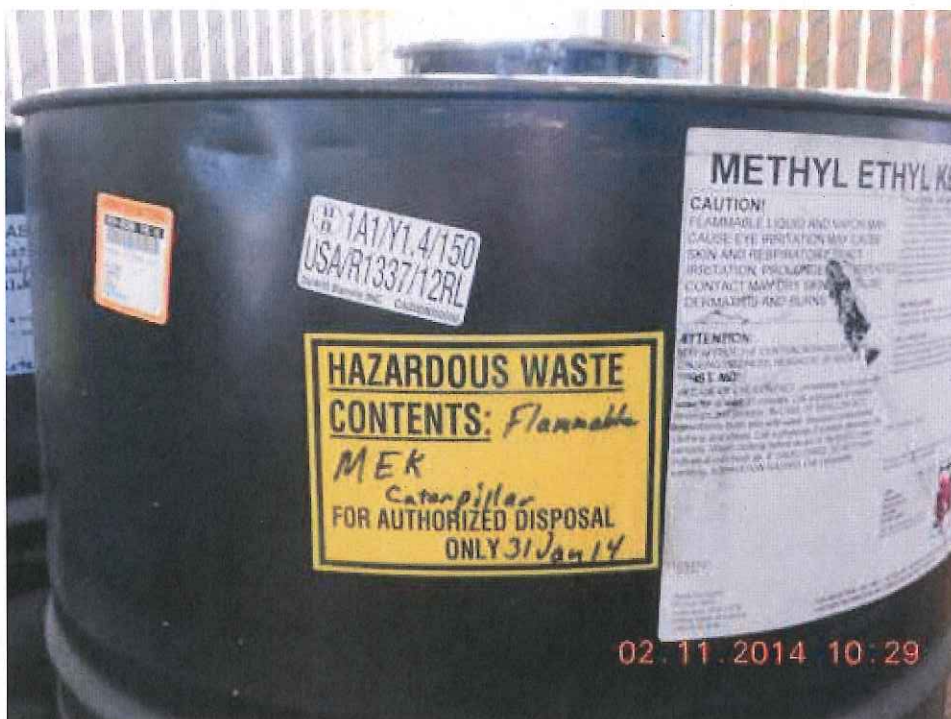


**Attachment A: Photographs for Caterpillar, Inc. Technical Center (ILD067407627)  
Mossville, IL**

**Photo Number** 9  
**Photo Filename** DSCN0618.JPG  
**Date/Time** 2/11/2014  
10:29:48 AM  
**Photographer** Todd Brown

**Description**

Label on the container of methyl ethyl ketone waste featured in photograph 7.  
Location: Hazardous waste storage area.



**Photo Number** 10  
**Photo Filename** DSCN0619.JPG  
**Date/Time** 2/11/2014  
10:30:06 AM  
**Photographer** Todd Brown

**Description**

Label on the container of gas cylinder waste featured in photographs 7 and 11. Location: Hazardous waste storage area.





**Attachment A: Photographs for Caterpillar, Inc. Technical Center (ILD067407627)  
Mossville, IL**

**Photo Number** 11  
**Photo Filename** DSCN0620.JPG  
**Date/Time** 2/11/2014  
10:30:24 AM  
**Photographer** Todd Brown

**Description**

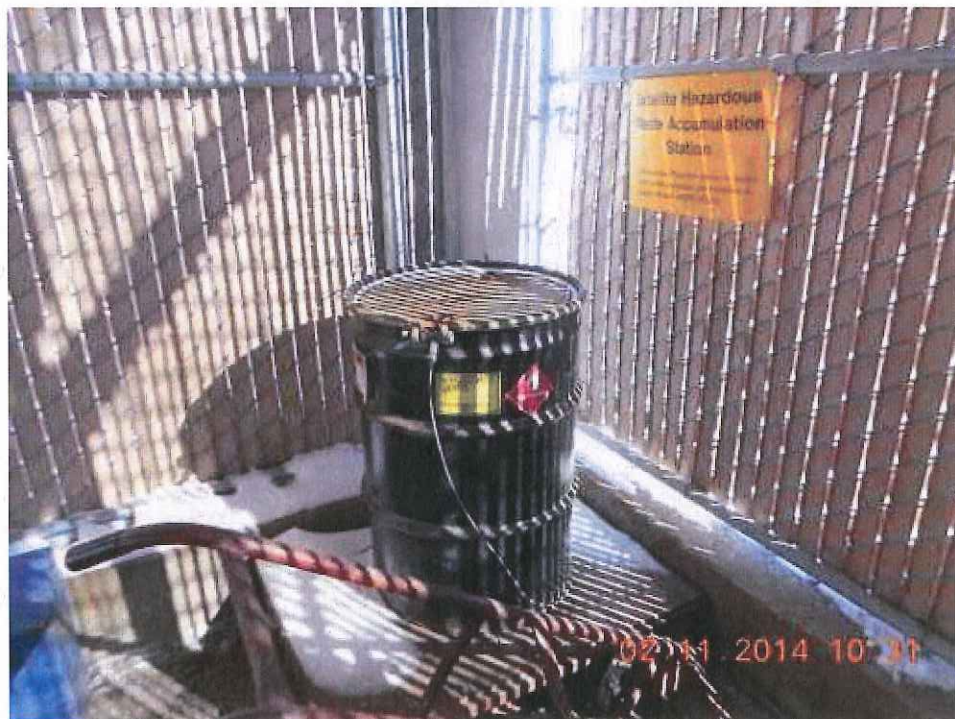
55-gallon container of gas cylinder waste.  
The container is also featured in the  
background of photograph 7. See  
photograph 10 for label. Location:  
Hazardous waste storage area.



**Photo Number** 12  
**Photo Filename** DSCN0621.JPG  
**Date/Time** 2/11/2014  
10:31:38 AM  
**Photographer** Todd Brown

**Description**

55-gallon container of ether cylinder waste.  
See photograph 13 for label. Location:  
Hazardous waste storage area.





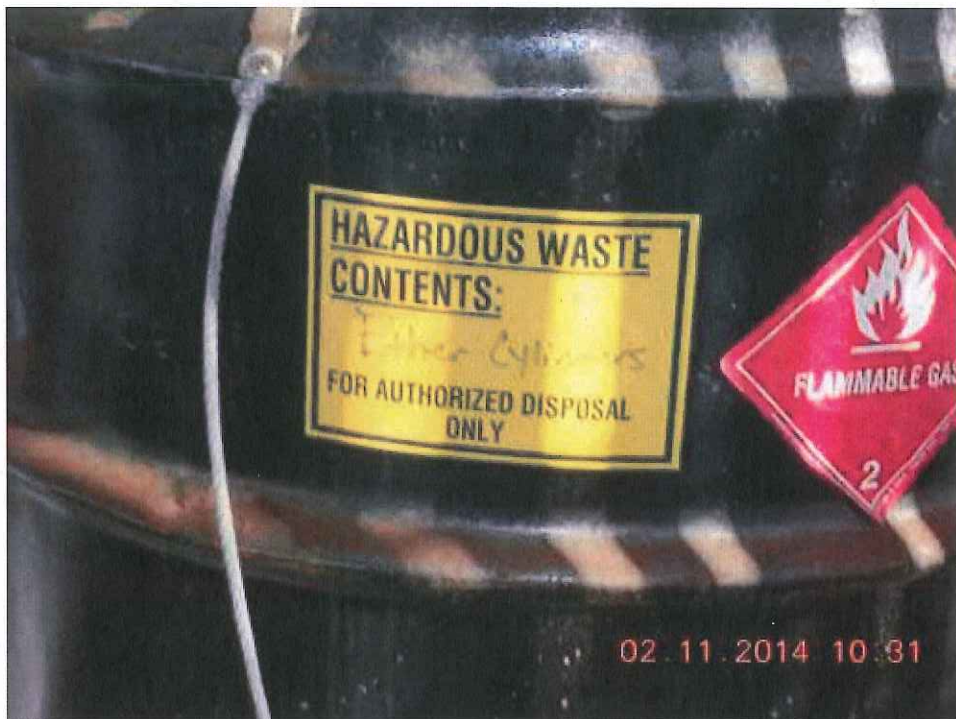
**Attachment A: Photographs for Caterpillar, Inc. Technical Center (ILD067407627)  
Mossville, IL**

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**Photo Number** 13  
**Photo Filename** DSCN0622.JPG  
**Date/Time** 2/11/2014  
10:31:48 AM  
**Photographer** Todd Brown

**Description**

Label on container of ether cylinders  
featured in photograph 12. Location:  
Hazardous waste storage area.



**Photo Number** 14  
**Photo Filename** DSCN0623.JPG  
**Date/Time** 2/11/2014  
10:33:32 AM  
**Photographer** Todd Brown

**Description**

Two crates of lab pack waste. See  
photographs 15 and 16 for labels. Location:  
Hazardous waste storage area.





**Attachment A: Photographs for Caterpillar, Inc. Technical Center (ILD067407627)  
Mossville, IL**

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**Photo Number** 15

**Photo Filename** DSCN0624.JPG

**Date/Time** 2/11/2014  
10:33:36 AM

**Photographer** Todd Brown

**Description**

Label on crate of lab pack waste featured on the right in photograph 14. Location: Hazardous waste storage area.



**Photo Number** 16

**Photo Filename** DSCN0625.JPG

**Date/Time** 2/11/2014  
10:33:44 AM

**Photographer** Todd Brown

**Description**

Label on crate of lab pack waste featured on the left in photograph 14. Location: Hazardous waste storage area.



## **Attachment B**

### **RCRA Generator Inspection Checklist (Part 722)**



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
	<b>Section 722.111 Hazardous Waste Determination</b>	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	808.121(a)
	<b>Section 722.112 USEPA Identification Numbers</b>	
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
	<b>Section 722.120 General Requirements</b>	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
	<b>Section 722.121 Acquisition of Manifests</b>	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
	<b>Section 722.122 Number of Copies</b>	
722.122	Does the manifest consist of at least 6 copies? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
	<b>Section 722.123 Use of the Manifest</b>	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p><b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>COMMENTS:</p>	
(725.278)	<p><b>Section 725.278 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p><b>Note:</b> If "No", go to Subpart C.</p> <p><b>SUBPART J: TANK SYSTEMS</b></p> <p>Has the generator closed an accumulation area?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p>Does the facility accumulate or treat hazardous waste in tanks?  Yes <u>      </u> No <u>      </u> N/A <u>      </u></p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	<p>725.211</p> <p>725.214</p>
(725.211) (725.214) (725.290)		



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?  Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?  Yes _____ No _____ N/A _____</p> <p>or  if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?  Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?  Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?  Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> <li>compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?  Yes _____ No _____ N/A _____</li> <li>placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift?  Yes _____ No _____ N/A _____</li> <li>provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?  Yes _____ No _____ N/A _____</li> <li>sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?  Yes _____ No _____ N/A _____</li> </ol> <p>and  is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> <li>a liner (external to the tank); or</li> <li>a vault; or</li> <li>a double-walled tank; or</li> <li>an equivalent device (approved by the Board)?</li> </ol> <p>Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?  Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release?  Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection?  Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water?  Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release?  Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b>  Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program? Yes _____ No _____ N/A _____</p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes _____ No _____ N/A _____</p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes _____ No _____ N/A _____</p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes _____ No _____ N/A _____</p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes _____ No _____ N/A _____</li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes _____ No _____ N/A _____</li> <li>- key parameters for automatic waste feed cut-off systems? Yes _____ No _____ N/A _____</li> <li>- communications or alarm systems? Yes _____ No _____ N/A _____</li> <li>- response to fire or explosions? Yes _____ No _____ N/A _____</li> <li>- response to groundwater contamination incidents? Yes _____ No _____ N/A _____</li> <li>- shutdown of operations? Yes _____ No _____ N/A _____</li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes _____ No _____ N/A <u>N/A</u></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes _____ No _____ N/A _____</p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes _____ No _____ N/A _____</li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes _____ No _____ N/A _____</li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes _____ No _____ N/A _____</li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes _____ No _____ N/A _____</li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes _____ No _____ N/A _____</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Section 722.142 Exception Reporting</b>	722.141(b)
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b>	
722.150	Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.150
	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b>	
722.160	Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.160
	<b>SUBPART G: FARMERS</b>	
722.170	Is the generator a farmer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170
	COMMENTS:	